

GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110  
(617) 482-1776  
Douglas B. Rosner  
Gregory O. Kaden

Counsel to Rogge Global Partners PLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	Case No. 08-13555 (JMP)
<i>et al.</i> ,	:	
	:	
Debtors	:	(Jointly Administered)
-----X		

**OBJECTION OF ROGGE GLOBAL PARTNERS PLC TO THE  
DEBTORS' MOTION TO RENEW MOTION TO ALLOW  
DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES**

Rogge Global Partners PLC ("Rogge") on behalf of itself and its present or former clients (collectively, the "Rogge Clients"), including the entities identified on Exhibit A hereto, that have submitted Derivative Questionnaires<sup>1</sup> and/or guarantee questionnaires (collectively, the "Questionnaires") in these chapter 11 cases, by and through its undersigned counsel, hereby renews its objection (styled previously as a joinder in the Objection of Creditors [ECF Docket No. 49132] (the "Creditor Objection")) to the Debtors' Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [ECF Docket No. 51312] (the "Motion") as follows:

1. Pursuant to the Bar Date Order, Rogge submitted Questionnaires in connection with the proofs of claim it had filed on behalf of the Rogge Clients. The Questionnaires included

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

confidential and proprietary information that Rogge understood would be accessible only to the Debtors, the Creditors' Committee and their respective advisors and counsel. Indeed, the Bar Date Order expressly limited access to the Questionnaires:

[T]he information submitted on the website <http://www.lehman-claims.com> in respect of Derivative Contracts and Guarantees will not be accessible on the website other than by the party that submitted such information, the Debtors, the Creditors' Committee and their respective advisors and counsel.

See Bar Date Order at p. 9, ECF Docket No. 4271.

2. Because the information provided by Rogge and the Rogge Clients in the Questionnaire remains confidential and proprietary, Rogge objects to the Motion and, to the extent applicable to Rogge and the Rogge Clients, Rogge hereby adopts and incorporates by reference the arguments set forth in the Creditor Objection and in the *Objection of Mitsubishi UFJ Securities International PLC to Debtors' Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Sections 107(a) of the Bankruptcy Code* [ECF Docket No. 51368].

WHEREFORE, for the foregoing reasons, Rogge respectfully requests that this Court: (i) deny the Motion; (ii) alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed; and (iii) grant such other or further relief as may be appropriate under the circumstances.

Dated: November 6, 2015

/s/ Gregory O. Kaden  
Gregory O. Kaden  
GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110-3333  
Tel: (617) 482-1776  
Fax: (617) 574-4112

**EXHIBIT A**

**Saudi Arabian Monetary Agency  
ABN AMRO Bank NV (Stichting Pensioenfonds van de)  
BAA Pension Trust Company Ltd.  
Boehringer Ingelheim  
Stichting Pensionfonds Apothekers  
Stichting Pensionfonds ENCI  
Reid Street Retirement Global Bond Fund  
Singapore Press Holdings  
Sutter Health- Eden Account  
Woo Hay Tong Investments Ltd.  
Trafalgar House**

GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110  
(617) 482-1776  
Douglas B. Rosner (DR-5690)  
Gregory O. Kaden(GK-9610)

Counsel to Rogge Global Partners PLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	Case No. 08-13555 (JMP)
<i>et al.</i> ,	:	
	:	
Debtors	:	(Jointly Administered)
-----X		

**CERTIFICATE OF SERVICE**

I, Gregory O. Kaden, hereby certify that on the 6<sup>th</sup> day of November, 2015, I caused to be served a copy of the ***Renewed Joinder of Rogge Global Partners PLC with Objection of Creditors to Debtors' Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires*** via the Court's CM/ECF system on the attached service list.

Dated: November 6, 2015

/s/ Gregory O. Kaden  
Gregory O. Kaden (GK-9610)  
GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110-3333  
Tel: (617) 482-1776  
Fax: (617) 574-4112

**Service List**

Curtis, Mallet-Prevost, Colt & Mosle LLP  
101 Park Avenue  
New York, NY 10178  
Attn: Turner P. Smith and Peter J. Behmke  
**Counsel to LBHI and certain affiliates**

Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue  
22<sup>nd</sup> Floor  
New York, NY 10010  
Attn: Andrew J. Rossman  
**Counsel to Creditors Committee**

Office of the US Trustee for Region 2  
201 Varick Street  
Suite 1006  
New York, NY 10014  
Attn: William K. Harrington, Susan Golden and Andrea B. Schwartz